

THOMAS P. HANAFAN  
MAYOR

November 12, 2004

Mr. Don West  
Environmental Management and Support, Inc.  
8601 Georgia Avenue, Suite 500  
Silver Spring, MD 20910

Dear Mr. West:

Since 2000, the City of Council Bluffs, Iowa has experienced a decline of approximately 500 jobs in various sectors of the local economy. The most significant loss included Acceptance Insurance which has cut its workforce by several hundred in the past several years. Much of the community's employment loss has been in its Mid City Corridor Area which includes the South Main Brownfields Project Area. This area has been particularly hard hit during the past decade. In fact, several long standing manufacturing operations which include AI Root, Giant Manufacturing, S M V Corporation, and others have either closed or relocated facilities in this area. Additionally, residents living in neighborhoods that abut this area have been forced to move to other communities in pursuit of employment. These events have resulted in making neighborhoods more vulnerable to crime and lack of investment as well as reflecting an increased reliance on public social services.

This is particularly true in the South Main Brownfields Project Area where the percentage of residents receiving some form of public financial assistance and/or living below the poverty line exceeds both the statewide and citywide averages. Further, this target area is within a state of Iowa designated Enterprise Zone (EZ). While the EZ designation provides financial incentives to encourage private sector investment, the requirements to be designated as such paint a dismal picture for the area. For example, designated districts must exhibit at least two of the EZ distress criteria relating to family poverty rates, population reductions, concentrations of elderly residents, reductions in the overall valuations of properties, housing vacancy and several other indices of economic decline and deterioration of the physical condition of buildings and infrastructure when compared on a statewide basis. Unfortunately, the South Main Brownfields Project Area meets several of these criteria.

However, rather than turn our back on this area, the Council Bluffs City Council and I are focusing our resources on removing the environmental barriers in the South Main Brownfields Project Area, investing in capital improvements that will make the area more conducive to attract new investment and employment opportunities, providing funding for improvements to the housing stock and providing inducements for increased home ownership. Moreover, we have assembled a multifaceted redevelopment team comprised of several City departments, including

assembled a multifaceted redevelopment team comprised of several City departments, including Community Development, Public Health, and Public Works to implement the appropriate policy and funding commitments for the area. Additionally, the Pottawattamie County Development Corporation and Community Housing Investment Corporation are serving both as a partner in the acquisition and banking of targeted sites for the purpose of removing environmental impairments and attracting businesses to invest in the South Main Brownfields Project Area district. Lastly, the City is partnering with Habitat for Humanity, affected property owners and residents to ensure that the desires and insights of those most impacted by the redevelopment project provide input and cultivate grass roots support throughout the area.

There are also several other exciting opportunities that can serve as a catalyst for renewed investment and employment opportunities. For example, Council Bluffs' central business district is two blocks to the north and the City has initiated several community betterment improvements to upgrade streets, utilities, street lighting, and pedestrian alignments. Also, the eastern boarder of the South Main Brownfields Project Area is bordered by ConAgra Foods that employs 800 people, and several newer manufacturers that have recently opened or are considering locations in the affected area. These businesses, both existing and prospective, provide opportunity and sustainability to the community and adjacent residential neighborhoods.

While these are exciting opportunities that the City of Council Bluffs can build upon, we constantly face the challenge of questions from prospective businesses concerning the types and nature of how environmental impairments could impact the South Main Brownfields Project Area. This is where the U.S. EPA's Brownfield Assessment Grant is most important. It will enable the City to target high priority sites, conduct environmental site assessments prior to purchase and assess risk. Moreover, this will better enable the City to coordinate with the EPA and Iowa Department of Natural Resources to ensure that any contamination found is dealt with through regulations and policies that are consistent with the long-term management and care of those areas. However, without the EPA's support the South Main Brownfield Project Area will continue to languish and deteriorate.

Thank you for your careful consideration of this proposal. On behalf of me and the Council Bluffs City Council we are extremely eager to list the EPA as a partner on our South Main Brownfields Project Team. If you have any questions, please contact me at (712) 328-4601 or Don Gross, Director of Community Development, at (712) 328-4629.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Belt", with a long horizontal line extending to the right.

Scott Belt, Mayor Pro-tem  
City of Council Bluffs

Enclosure: EPA Brownfields Assessment Grants

c: Susan Klein, EPA, Region 7 Brownfields Coordinator

**U.S. EPA Brownfield Assessment Grant Proposal  
Hazardous Materials**



**The City of Council Bluffs, Iowa  
South Main Brownfields Project**

**Prepared By:**

**The City of Council Bluffs, Iowa  
Department of Community Development**



**November 2004**

A. Project Title	City of Council Bluffs, Iowa – South Main Brownfields Project
B. Grant Type	Brownfield Assessment Grant
C. Total Dollar Amount Requested	\$200,000 for Hazardous Material Assessments (area wide)
D. Name of Applicant	City of Council Bluffs, Iowa
E. Project Contact	Mr. Donald Gross Director Department of Community Development City of Council Bluffs 209 Pearl Street Council Bluffs, Iowa 51503 Phone: (712) 328-4629 FAX: (712) 328-4915 E-Mail: <a href="mailto:dgross@councilbluffs-ia.gov">dgross@councilbluffs-ia.gov</a>
F. Chief Executive	Mayor Thomas P. Hanafan City of Council Bluffs 209 Pearl Street Council Bluffs, Iowa 51503 Phone: (712) 328-4601
G. Location	County of Pottawattamie, Council Bluffs, Iowa
H. Population	58,268 (2000 Census)
I. Other	<p>According to the 2000 U.S. Census:</p> <ul style="list-style-type: none"> <li>▪ The City of Council Bluffs population is well below 100,000.</li> <li>▪ The population of the target area<sup>1</sup> has a per capita income as low as \$16,700 which is approximately 18% less than the statewide average and 9% less than the citywide average.</li> <li>▪ Additionally, as much as 11% of families residing within the target area are living below the poverty line.</li> <li>▪ Up to 7% of the residents in the target area receive supplemental security income from the federal government. This is more than double the Iowa rate of 3% and nearly double the city average of 4%.</li> <li>▪ Up to 5% of the residents in the target area receive some form of public assistance income. This exceeds the statewide and citywide percentages of 3% and 4% respectively.</li> </ul> <p>Additionally, the target area and site is located within a designated Urban Renewal Area based on the presence of slum and blighting conditions and is part of a state designated Iowa Enterprise Zone.</p>

<sup>1</sup> The target area is defined as Census Tracts 308 and 310.

### Threshold Criteria

#### A. Applicant Eligibility

The City of Council Bluffs, Iowa is a municipal corporation as defined by the Code of Iowa, Chapter 362. The City was incorporated on April 13, 1853.

#### B. Community Notification

The City of Council Bluffs has initiated several efforts to inform the citizens, affected property owners and other interested parties about the scope of this brownfields redevelopment initiative. These public involvement efforts have also attempted to engage citizens and other stakeholders in the preparation of this funding proposal. Applying several community notification and involvement measures allowed various stakeholders to participate in grant development efforts based on their individual schedules and level of interest.

The community notification approaches used to prepare this funding proposal included:

- *Posting draft documents at public venues:* A copy of the draft Assessment Grant was provided at the City Clerk's office and public library. Also included was a copy of the EPA Proposal Guidelines for Brownfields Assessment Grants. This would enable the reviewer to consider and offer comments on responses to questions consistent with the EPA Grant Guidelines.
- *Posting draft documents on the City Internet Website:* Similar to posting the information at public venues, the City also posted draft documents on the City's website soliciting comments and suggestions.
- *Publishing notices for public comment through local media outlets:* The City issued press releases to area newspapers, television and radio stations asking citizens to participate in the grant development process. The message also included information about where and how they could be involved in the project.
- *Engage specific interest groups:* Copies of the draft grant and associated proposal guidelines were mailed to affected residents, property owners, the Department of Public Works, the Department of Public Health, Community Housing Investment Corporation, Pottawattamie County Development Corporation, Council Bluffs Chamber of Commerce, and non-profit organizations.
- *Hosted a public meeting:* The City publicized a public meeting held in the Community Hall at 205 South Main Street, Council Bluffs, Iowa on October 28, 2004. The public meeting included a presentation summarizing the scope of the project and draft responses to various questions raised by the EPA. The presentation also included hand out materials and contact information for participants to follow up if they had information to offer at a later date.
- *Adoption of a City Council Resolution:* The Council Bluffs City Council adopted a resolution of support and endorsed the submission of the grant proposal. This meeting and Council action was subject to a published public notice and also included time for public comment prior to taking action on the resolution. Exhibit A is a copy of the adopted resolution.

C. Letter from State Environmental Authority

Exhibit B is a letter from Mr. Mel Pins, representing the Iowa Department of Natural Resources, acknowledging the City's intent to file the Brownfields Assessment Grant with the U.S. EPA.

D. Site Eligibility and Property Ownership Eligibility

Council Bluffs is submitting a *Community Wide* application. As such, Section D is not relevant to this proposal.

**Ranking Criteria**

A. Assessment Grant Proposal Budget

**Assessment Grant Proposal Budget – Hazardous Substances Sites:** The budget summarized below reflects how funds would be committed to implement the EPA Brownfields Assessment Grant for those sites believed to be adversely impacted by hazardous substances.

Budget Categories (programmatic costs only)	Project Tasks					
	Task 1	Task 2	Task 3	Task 4	Task 5	Task 6
Personnel	\$0	\$0	\$0	\$0	\$0	\$0
Travel	\$5,000	\$0	\$0	\$0	\$0	\$0
Equipment	\$0	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$0	\$0	\$0
Contractual	\$5,000	\$20,000	\$40,000	\$110,000	\$10,000	\$10,000
Other	\$0	\$0	\$0	\$0	\$0	\$0
<b>Total</b>	<b>\$10,000</b>	<b>\$20,000</b>	<b>\$40,000</b>	<b>\$110,000</b>	<b>\$10,000</b>	<b>\$10,000</b>

*Budget Key:*

- Task 1: Program Implementation – Expenses incurred for activities integral to achieving the purpose of the grant including reports, meetings, conferences, and coordination. Programmatic activities associated with implementing this grant (e.g., meeting reporting requirements, community involvement, etc.) that are assumed by City staff will be provided on an in-kind basis. Further, these City staff driven efforts will be offset through the City's general fund budget.
- Task 2: Community Outreach – Research, technical assistance and training necessary to inform the residents of the target area of the progress of the investigation and its impact on redevelopment planning and implementation. This task also envisions conducting a health study of target area residents and workers, plus integrating the results of Phase I & II ESA data. The City also plans on using a dedicated Internet website to provide updates on the project, post reports, etc.
- Task 3: Phase I Assessments – Conduct preliminary investigations on targeted properties including obtaining site access agreements and report submittal.

- Task 4: Phase II Assessments – Conduct detailed investigations on targeted properties including obtaining site access agreements, collecting soil and groundwater samples, laboratory analyses, and report submittal.
- Task 5: Work Plans – Development and approval of program quality assurance documents to include Quality Assurance Project Plans, Site Specific Sampling Plans, Phase I Site Priority Work Plans and related documents.
- Task 6: Cleanup Planning - Evaluate alternatives for proceeding with further characterization and potential remediation at each Phase II property. The alternatives will be developed in light of regulatory considerations. In addition to methods for proceeding with further action (including potential enrollment in Iowa's Land Recycling Program or Underground Storage Tank Program), preliminary cost estimates will be developed for the various further action alternatives. A brief further action alternative evaluation report will be prepared for each property. Coordinate ESA progress and results with EPA Region VII staff via an "activity brief" to gain concurrence on activity conducted and pending future activity. Additionally, future alternative plans for proceeding through the brownfields redevelopment process will be presented to EPA Region VII staff.

#### B. Community Need

1. The South Main Brownfields Project Area is among the oldest and most deteriorated industrial districts in Council Bluffs. Several properties have been left vacant and very little new investment has occurred in the area. Residents in adjacent neighborhoods represent low income and economically disadvantaged areas that bear a disproportionate share of living in an area stigmatized by depressed property values, heavy truck and railroad traffic, urban noise and odors associated with manufacturing processes. The table below further illustrates the environmental injustices plaguing this area.

Factor/Area	Target Area "A" <sup>2</sup>	Target Area "B" <sup>3</sup>	City of Council Bluffs	Pottawattamie County	State of Iowa
Total Population	3,155	2,426	58,249	87,704	2,926,324
Poverty Rate <sup>4</sup>	7%	11%	10%	8%	9%
% of Children under 5 years living in poverty	10%	3%	12%	12%	10%
Unemployment Rate	N/A	N/A	6.8%	5.9%	4.5%
Per Capita Income	\$16,700	\$19,527	18,143	\$19,275	\$19,674
% Minority Population	8%	4%	4%	3%	5%

<sup>2</sup> Census Tract 308

<sup>3</sup> Census Tract 310

<sup>4</sup> Defined as the percentage of citizens living below the poverty line.

Factor/Area	Target Area "A" <sup>5</sup>	Target Area "B" <sup>6</sup>	City of Council Bluffs	Pottawattamie County	State of Iowa
% Households receiving SSI	7%	5%	4%	2%	3%
% Households receiving Public Assistance	3%	5%	4%	5%	3%

*Sources: Information associated with total population, poverty rate, per capita income, percent minority population, percent households receiving SSI and Public Assistance were obtained from the 2000 U.S. Census. Unemployment Rate information reflects August 2004 statistics issued by Iowa Workforce Development.*

In addition to this information, the University of Iowa published a study entitled, *2004 Cancer in Iowa Report* that cited Pottawattamie County as one of the top ten counties in Iowa for projected cases of cancer and estimated numbers of deaths attributed to cancer. Moreover, as a percentage of new cancers and cancer deaths between 1973 and 2001, Pottawattamie County had the highest death rate in Iowa.

In nearly every measurement attributed to characterizing disadvantaged neighborhoods, residents in the proposed brownfields target area bear a comparatively high burden of living in an economically disadvantaged area. Moreover, exposure to carcinogens in the greater Council Bluffs area is clearly higher than other communities and counties in Iowa. Consequently, the City's plan to use these Brownfields Assessment funds to complete environmental site assessments on priority sites, determine if there is a significant environmental concern and if one or more exist, apply appropriate institutional or engineered controls to address identified concerns. And, if appropriate, implement cleanup standards that help facilitate renewed interest in improving the economic vitality in the area for both residents and businesses, plus remove the potential adverse environmental concerns.

2. Ultimately the presence of underutilized, vacant and abandoned commercial and industrial buildings raises questions of environmental contamination, which depresses area property values and exacerbates the economic isolation of the affected residents. Coupled with other community resources and a commitment to revitalize the area, the Brownfields Assessment Grant will enable the City to conduct Environmental Site Assessments (ESAs) on priority sites and determine what if any environmental impairments exist. This will also enable the City and its partner the Pottawattamie County Development Corporation (PCDC), to assess the level of risk in acquiring targeted sites and "banking" them for future redevelopment projects. Land banking programs are strengthened by determining how environmental contaminants could impact land value and assist in defining the conditions of a land acquisition agreement. Additionally, this information will help determine appropriate reuses for the affected properties and how they can be assimilated into the

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<sup>5</sup> Census Tract 308

<sup>6</sup> Census Tract 310



target area in a manner that adds stability to the adjoining neighborhood and affected residents. Moreover, these efforts will help leverage funds from other sources and provide solid justification for investing public funds based on identified needs.

Plans to use a portion of the Assessment Grant to investigate the health affects of residents and workers within the target area and develop appropriate responses that mitigate associated health risks will also benefit the targeted community.

3. Since its incorporation in 1853, Council Bluffs has been known as an industrial community with significant links to the agricultural, food product, and heavy machinery manufacturing businesses. While contributing to the economic strength of the community, some of these businesses have also had or pose an adverse environmental impact on the community. For example, Council Bluffs has a total of 228 EPA Regulated Facilities, 128 Resource Conservation and Recovery Act (RCRA) Hazardous Waste Generators, 68 Regulated Air Emissions sites, 6 Toxic Release Inventory sites, 21 Comprehensive Environmental Response and Compensation Liability Act (CERCLA) sites, and 11 sites with EPA violations. In addition, the Iowa Department of Natural Resources (IDNR) database has identified 34 National Response Center (NRC) Spill sites, 1 IDNR Hazardous Waste Site, 2 IDNR Landfill sites, and 119 IDNR Leaking Underground Storage Tank (LUST) sites. Several of these potential brownfields sites are within the South Main Brownfields Project Area referenced in Exhibit C.

In several instances the presence or perceived presence of environmental impairments have been complicated by the declining use and closure of many traditional manufacturing operations such as rail yards, lumberyards, foundries, general manufacturers, food processing plants and related supporting businesses in the South Main Brownfields Project Area. These factors have contributed to reduced property values of vacant and abandoned industrial buildings as well as the value of homes in adjacent residential neighborhoods. Additionally, potential health concerns stemming from the likely presence of hazardous materials and petroleum-based contaminants, and the presence of attractive nuisances that contributes to children being attracted to unsecured areas, clearly has a deleterious effect on the economic, health and environmental impacts of the area.

#### C. Site Selection Process

1. The City recognizes the real adverse impacts resulting from brownfields sites and the ripple effect that occurs in adjacent areas. Based on these effects, the City and various stakeholders created several criteria to determine the appropriateness of potential brownfields sites and then prioritize them. These criteria include:
  - Listing on EPA or Iowa DNR databases
  - No federal or state intervention/cleanup efforts are underway or being contemplated
  - Proximity to municipal or private well
  - Unsecured property
  - Potential for contamination
  - Proximity to residential areas
  - Proximity to schools

- Potential for environmental justice issues to surrounding residents
- Potential reuse of the site for economic development
- Potential reuse of the site for open/green space
- Access to utilities
- Ability to secure access to the site
- Status of property tax and/or municipal fee delinquencies

Based on these criteria, the historic uses in the area and the current existence of underdeveloped sites, the City has prioritized several classes of properties for Phase I Environmental Site Assessments (ESAs) and Phase II ESAs if warranted. These types of sites include:

- Former coal gas manufacturing facilities.
- Former heavy manufacturing operations, including manufacture of agricultural equipment.
- Railroad alignment and associated storage areas.
- Unregulated dumping sites.
- Above Ground Storage Tanks.

The City will also consider targeting additional properties for Phase I ESAs based on the prospective site's ability to meet the selection criteria and the availability of Assessment Grant funding.

2. Previous efforts to inventory and prioritize potential brownfields sites occurred as part of a community planning effort that resulted in the creation of the South Main Urban Renewal Area Plan and Tax Increment Financing District. The City's Community Development Department involved affected property owners, area residents, the City Planning and Zoning Commission, City Health Department, building and zoning officials, the fire marshal, economic development representatives, real estate developers, members of the financial community and the City Council to assess the existing conditions of the area and develop a comprehensive plan to overcome the adverse conditions presently stigmatizing the area. This application for Brownfields Assessment funding is in direct response to the City's identified need to assess the environmental condition of properties that are having a negative impact on the area and develop strategies to remove the environmental stigma from the area. Consequently, the proposed Assessment grant will be used to assess environmental risk and associated liabilities and use this information to acquire, cleanup and return targeted sites to productive reuse.
3. This project anticipates conducting environmental site assessments on privately owned properties. As such, the City will secure voluntary permission from targeted property owners through an Access Agreement. This Agreement outlines provisions that authorize the City and/or its contractors to gain access to the site for the purpose of conducting environmental site assessments. Although the City wishes to secure access through amicable means, it will also pursue more involuntary efforts (e.g., condemn for a temporary easement) to secure access in situations where the public interest to protect public health and safety is necessary.

D. Sustainable Reuse of Brownfields

The South Main Brownfields Project is consistent with the goals of the EPA's brownfields initiative and provisions within the South Main Urban Renewal Area Plan and other plans adopted by the Council Bluffs City Council. The summary below highlights the relationship between each EPA program goal and the City proposed reuse.

1. The City is working with local and state health and environmental agencies to prevent pollution and reduce resource consumption. For example, the City Health Department and Fire Marshall have cited several recommendations designed to mitigate exposure to known contaminants. Among these recommendations is adopting risk-based corrective actions based on future use, considering the application of institutional controls and insurance, and empowering the public to act with respect to the type of risk communicated. Moreover, the City encourages and incentivizes economic development projects that include green building design, alternative storm water management, environmentally beneficial landscaping and other building and design approaches to sustainable redevelopment.
2. Exhibit D illustrates the proposed redevelopment plan for the South Main Brownfields Project Area. The intent of this plan is to create opportunities for new private sector investment in the area that creates sustainable employment opportunities, enhanced tax base and benefits residents in the adjacent neighborhoods. Recommended uses include a mixed office and warehouse area, with neighborhood scale commercial areas abutting arterial streets and the residential areas, and integrating the use of streetscaping and greenspace to help buffer and mitigate impacts brought on by differing land uses. A clear goal of this plan is to create quality employment opportunities, expand the tax base and enhance the property values in the area. We are confident this plan achieves these goals.
3. The South Main Brownfields Plan integrates mixed uses to create economic opportunity for those seeking employment, while creating commercial retail and housing alternatives that compliment adjacent neighborhoods and contribute to their sustainability. For example, the inclusion of a senior housing development will provide an important anchor project for the south end of the downtown area and provide convenient means of transporting seniors and other citizens via public transit, trail/sidewalk systems, private vehicle, etc.
4. One of the greatest examples of how this project promotes sustainable reuse is in the commitment to reinvest in the city's urban core. Rather than perpetuating growth at the urban fringe, the City is making a clear commitment to revitalize underdeveloped and environmentally impaired areas that have a wide array of public utility services and resources. In fact, the presence of the Council Bluffs Senior Center provides inter-generational programs for senior citizens and area youth. Additionally, Habitat for Humanity, which operates a facility in the target area, and the Community Housing Investment Corporation target sites in the area for new housing construction for low-income individuals. Lastly, the Council Bluffs Panthers Wrestling Club is conveniently located to disadvantaged youth living in the area and provides youth programming.

5. Redevelopment within this target area will promote the use of several transportation choices. Planned improvements include provisions for trails linking neighborhoods with employment centers, retail districts, schools, and recreational venues such as area parks and regional trail systems. In addition, the target area is served by a regional transit and para-transit system to meet the needs of families with limited transportation options and/or physical disabilities.
6. Through this redevelopment process, the City has adopted several initiatives to prevent the creation of future brownfields sites. For example, the City Council applies financial incentives to encourage new, cleaner industries to develop in areas impacted by abandoned or underdeveloped properties. The City Council has also adopted ordinances, land use restrictions and procedures that prohibit or add regulatory review to land use types that have historically had an adverse impact on the environment. Additionally, the City's zoning ordinance prohibits the construction of private wells and encourages the appropriate abandonment of private wells.

E. Creation and/or Preservation of Greenspace/Open Space or Nonprofit Purpose

The South Main Brownfields Plan creatively uses greenspace and open space areas to buffer residential areas from proposed commercial and office/warehouse districts. This is a constructive means of transitioning different land uses while establishing urban stability in the area. To illustrate, greenspace buffers will serve both to transition land uses while integrating pedestrian facilities to accommodate residents coming and going to work, exercise, or shop. The clear advantage to this approach is that these facilities will be owned and maintained by the City of Council Bluffs. This will ensure long-term management and care for the facilities as well as meet the demands of the community. In addition, the application of policies and using regulatory agencies like the Iowa Department of Natural Resources to apply risk-based corrective actions that are consistent with future uses as well as applying institutional and engineered controls will provide for the long-term management and care of the area.

As referenced in Section D, the Habitat for Humanity facility, Council Bluffs Senior Center, and Council Bluffs Panthers Wrestling Club are representative non-profit organizations within or adjacent to the South Main Brownfields Project Area and provide a wide array of programming for area citizens. Additionally, these organizations also contribute to building neighborhood stability.

It is also important to point out that the proposed reinvestment in the area will preserve the open space and the urban fringe. As part of the City's growth management practices and consistent with the Comprehensive Plan, the City Planning Commission and City Council emphasize the reuse and revitalization of urbanized areas to the extent possible versus encouraging development at the fringe of Council Bluffs. The net result is facilitating higher density development within the city limits, preserving agricultural land and the unique geological formation in the form of the Loess Hills.

F. Community Involvement

1. As indicated in Section B of the Threshold Criteria, Council Bluffs has used several community involvement approaches to identify and engage various stakeholder groups in the preparation of this funding proposal. However even before the preparation of this funding request, the City initiated several other initiatives that brought various segments of the community together to define the redevelopment needs of the South Main Brownfields Project Area and define how these ideas would make Council Bluffs a more vibrant community. For example, the creation of the South Main Urban Renewal Area Plan involved numerous interest groups such as the Chamber of Commerce, Pottawattamie County Development Corporation (PCDC), the Iowa West Foundation, Council Bluffs Senior Center, affected property owners, and residents. This commitment to meaningful community involvement has resulted in a redevelopment plan poised for positive change and has cultivated community support.

To ensure that this project stays at the forefront of community revitalization efforts and is implemented as planned, the South Main Brownfields Project Steering Committee has been assembled. With representation from the groups listed above, the Steering Committee will use this assessment grant to assess environmental risk associated with acquiring targeted sites, make recommendations to the City and PCDC regarding the acquisition, cleanup and redevelopment of these sites and ultimately banking them for future redevelopment. Additionally, the Committee will be integral to leverage the City's efforts to keep the community and area stakeholders informed about the progress of the project and solicit feedback concerning cleanup decisions and reuse planning in the context of what the ESAs uncover. The City will act in a manner consistent with the National Contingency Plan relative to designating a spokesperson to inform the community, preparing an Engineering Evaluation/Cost Analysis (EE/CA), developing and implementing a community relations plan, identifying a repository for related information, publishing appropriate notices, providing adequate review time for relevant documents, and responding to significant concerns.

2. Prior to the submission of this funding proposal, Council Bluffs and some representative owners of potentially environmentally impaired sites have been involved in discussions with the City Public Health Department and Iowa Department of Natural Resources, Iowa Department of Economic Development and Iowa Department of Transportation about the environmental concerns of the targeted area, its implications to human health and future reuse. The City will perpetuate this relationship with these agencies and the U.S. EPA as necessary. To the extent possible the City will likely pursue enrollment in the Iowa Land Recycling Program or equivalent cleanup program; consequently, it is in the City's best interest to engage appropriate regulatory agencies as early as possible and seek their counsel in cleanup and reuse decisions.
3. The City believes that by using a wide array of communication mechanisms, community understanding will increase and more meaningful dialogue will result. Consequently, the City will host frequent open houses to share results from field studies and engage citizens in sharing ideas and opinions concerning cleanup options. The City will also conduct presentations to various interest groups, City Council, and others concerning the progress

of the project. Additionally, information will be shared through the City's Internet Website. Representatives from the South Main Brownfields Steering Committee will also be tasked with the responsibility to share information with their respective groups as a means of cross pollinating stakeholders with information and soliciting feedback that can be shared with the Steering Committee.

According to the 2000 U.S. Census, only a small fraction of the target area residents speak languages other than English as their primary language. In fact, only four percent of the residents in part of the target area speak fluent Spanish, Indo-European, or Asian languages combined. Consequently, in those unique situations where information requires translation, the City will accommodate requests on an as needed basis. The City will also try to accommodate individuals with hearing or visual impairments.

4. The table below highlights the participants involved in this project, their contact information and a summary of their role in the project.

Contact	Phone Number	Agency/Association	Organization's Activities
Bob Mundt, President/CEO	712-325-1000	Council Bluffs Chamber of Commerce	Business retention and attraction
Matt Buchanan	712-325-1000	Pottawattamie County Development Corp.	Conduct land banking and redevelopment activities.
Edward Clement, Environmental Services	816-737-7408	Aquilla, Inc.	Owner of targeted site.
Greg Reeder, City Engineer	712-328-4635	City of Council Bluffs Public Works Department	Plans and implements capital improvements throughout the City.
Doug Drummy, Director	712-328-1008	Council Bluffs Water Works	Plans and implements capital improvements concerning water projects in Council Bluffs.
Donn Dierks, Director	712-328-4666	Council Bluffs Public Health Department	Focuses on improving, protecting and promoting the health, environment and the well-being of residents in Council Bluffs
Ron Hopp, Director	712-328-4650	Council Bluffs Parks, Recreation & Public Property Department	Responsible for the construction, management and maintenance of parks and publicly-owned property in Council Bluffs
Tom Jensen, Executive Director	712-323-5995	Council Bluffs Senior Center Inc.	Operates and directs programming for this non-profit organization located in the target area.

Contact	Phone Number	Agency/Association	Organization's Activities
Ron Pierce, Executive Director	712-328-9476	Habitat for Humanity	Builds housing for low-income residents and has a facility in the target area.
Joe Kueper, Executive Director	712-328-6602	Community Housing Investment Corporation	Builds Infill housing for low and moderate-income residents throughout the city.

G. Reduction of Threats to Human Health and the Environment

1. The types of properties being targeted for Environmental Site Assessments (ESAs) are commonly associated with the release of heavy metals, volatile and semi-volatile organic compounds, PCBs, Coal Tar, and PAHs. These contaminants are also known carcinogens. To establish a bench mark pertaining to the health conditions of persons living and working within the target area, the City will commit up to 10 percent of the grant award to identify threats to human health and the overall environment of the target area. This health assessment, coupled with the environmental site assessment efforts will help create broad and site specific recommendations that effectively reduce exposure to elements in the environment that compromise a healthy living and working environment. Additionally, the continued involvement of the City's Public Health Department is key to the successful implementation of the South Main Brownfields Project. Specifically, the City will follow the approach summarized below to identify threats:
  - The City will use property tax records to assemble a distribution list of residents and businesses within and adjacent to the target area. Both residents and business owners will receive a letter and survey outlining the purpose of the questionnaire and how the information will be used. Alternatively, the cover letter will also direct the resident/worker to an Internet website where the person could complete the survey. The City will develop a questionnaire with the assistance of qualified public health officials. Moreover, the cover letter will highlight how the survey results will be used and assure respondents that the results will remain confidential.
  - Phase I Environmental Site Assessments will be conducted on targeted sites, and if appropriate, Phase II ESAs will be performed. Reported findings will identify and discuss recognized environment concerns that pose a real health threat to humans and/or the environment.
  - All non-client specific data will be shared with the Public Health Department and the Environmental Consultant for the purpose of analysis and to develop recommendations of how the area could be redeveloped to eliminate or substantially reduce adverse impacts.
  - The City will also re-survey the affected area every five years to monitor changes in health and environmental conditions and assess the effectiveness of implementing associated recommendations.
2. The City has participated in meetings with the Iowa Department of Natural Resources and property owners from the target area to define a responsible approach to assess,

characterize and plan for the cleanup and redevelopment of the South Main Brownfields Project Area. Through the use of this grant, the City anticipates having more substantive discussions with IDNR and affected property owners to identify and apply a risk-based plan to remove and/or manage any adverse environmental conditions found through the environmental site assessment process.

#### H. Leveraging of Additional Resources

1. This project is at an early stage of development; consequently, it is difficult to fully define the anticipated financial needs of the project. However, despite this situation the City has established several funding need parameters and identified funding sources to address these concerns. As this project is implemented, the City proposes to expand current relationships with EPA staff, and representatives from appropriate state agencies (e.g., Iowa Department of Natural Resources, Iowa Department of Economic Development and Iowa Department of Transportation) to examine the appropriate fit of the proposed project and eligibility considerations of various programs summarized below.

- *Strategically use EPA Brownfields Grants to assess risk prior to purchase.* At this stage of the project, this request for Assessment Grant assistance is Council Bluffs' top priority. In fact, using these funds to identify environmental contaminants, assess risk and liability and consider possible cleanup strategies is the cornerstone of the City's ability to acquire these sites responsibly and begin the redevelopment process. Section C references several types of properties that are candidates for Phase I ESA's the City is also home to 228 EPA Regulated Facilities, 128 RCRA Hazardous Waste Generators, 68 Regulated Air Emissions sites, 6 Toxic Release Inventory sites, 21 CERCLA sites, and 11 sites with EPA violations. In addition, the IDNR database has identified 34 NRC Spill sites, 1 IDNR Hazardous Waste Site, 2 IDNR Landfill sites, and 119 IDNR LUST sites. Based on this extensive inventory of potential candidate brownfields properties, Council Bluffs clearly has several other sites that are excellent candidates for environmental site assessments.

In addition to the Assessment Grant, the City will explore the applicability of EPA Revolving Loan Fund and/or Cleanup Grant programs to address clearly defined environmental concerns.

- *Leverage local resources to position the South Main Brownfields Project for renewed investment.* The Pottawattamie County Development Corporation has played an effective role in acquiring properties for the purpose of facilitating redevelopment in the Council Bluffs area. We see their involvement in this project as critical to its success because they focus exclusively on removing the barriers to sell and redevelop the properties, thus creating new job opportunities and diversifying the local tax base. A clear advantage in this situation is that the Pottawattamie County Development Corporation and the City are partnering to convert these environmentally impaired properties into a sustainable reuse. To fully satisfy its role, however, the Assessment grant will help evaluate the environmental risk and help determine fair market value of the properties prior to purchase.



- *Use local funding mechanisms to facilitate redevelopment efforts.* The South Main Brownfields Project area is within the South Main Urban Renewal Plan Area. As such this district has the ability to create tax increment revenue to reinvest in public improvements, site redevelopment and other eligible expenses that remove the existing slum and blighting conditions in the area. In addition, Council Bluffs is a federal entitlement city and receives \$1.3 million through the U.S. Department of Housing and Urban Development's Community Development Block Grant (CDBG) Program. These funds have been used successfully to reinvest in housing stock, utilities, roads, etc., in low-to-moderate income neighborhoods. This target area is an excellent candidate for the use of these funds as a means of removing blighting conditions and encouraging private sector investment.
  - *The South Main Brownfields Project Area is designated as an Iowa Enterprise Zone.* This designation will provide the added incentive of providing investment tax credits to private sector investments in the area. It is also significant to note that Enterprise Zones can only be established in areas that meet two or more of the following criteria: comparatively low per capita income, housing vacancies at 10 percent or above, property valuations that are 75 percent or less of the countywide average, and show signs of blight.
  - *Commercial activities in the area will be eligible for the New Market Tax Credits.*
  - *Have invested approximately \$5 million in capital improvement projects to upgrade public facilities and make the area more conducive to attract private sector investment.*
  - *Diligently research and pursue additional relationships and funding opportunities that removes the environmental stigma of the area and facilitates redevelopment.* The City and its partners are committed to obligate the resources necessary to establish new and expanded relationships with potential funding sources as well as private sector entities that can expedite the implementation of the South Main Brownfields Project.
2. The City, PCDC and other local organizations have invested approximately \$3 million to begin the process of overcoming the blighting conditions pervasive in the Mid-City district; plus countless in-kind hours spent to leverage these funds, meet with affected property owners and residents, and work with area and state agencies. Additionally, the City has obligated general fund monies through Capital Improvement Project budgets to reinvest in infrastructure and make the area more conducive to private investment. Despite this commitment of time and investments, the South Main Brownfields Project Area requires the assessment funds to define the magnitude of the environmental concerns and develop a strategy to address these concerns. Consequently, this grant is key to the success of this initiative.
3. Beyond the funding commitments described in subsections 1. and 2. of this section, the City has experience and success securing additional funds and investment incentives through federal and state government as well as local foundations that will direct capital and private investment in specific ways. For example,
- Federal Economic Development Administration Funding for public works and brownfields projects.

- Federal Brownfields Economic Development Initiative Funding (BEDI) to invest in the redevelopment of brownfields properties and benefit low income areas.
- Iowa Department of Transportation Revitalizing Iowa's Sound Economy funding to invest in transportation infrastructure, including railroad lines, that leads to new job creation. Additionally, the IDOT also provides additional points for projects involving brownfields sites.
- Federal and state housing assistance programs, such as the Senior and Local Housing Assistance program, Low-Income Housing Tax Credits, New Market Tax Credits, Historic Tax Credits, HOME funds to create or improve affordable housing options, Farmers Home Administration Insured Mortgages, and continued support from the Iowa West Foundation.

I. Ability to Manage Grants

1. The City of Council Bluffs has a wealth of experience in managing federal contracts and is confident that these experiences will enable the City to manage and oversee all phases of work under this grant. Mr. Donald Gross, Director of Community Development will be assigned grant management responsibilities. Additionally, Mr. Scott Sanders, Finance Director will provide assistance as needed by Mr. Gross. Both Mr. Gross and Mr. Sanders have the requisite experience to meet the financial management needs of this project. Several federal and state grants currently being administered by the City of Council Bluffs include several federal and state funds including Economic Development Initiative, Economic Development Administration, public safety grant (COPS), Community Development Block Grant (CDBG), Home Investment Partnership (HOME) Program, Emergency Shelter Grant (ESG) Program, Federal Emergency Management Agency (FEMA) Project Impact Grant, and an Iowa Department of Transportation Revitalizing Iowa's Sound Economy (RISE) roadway improvement grant.

Additionally, Mr. Gross will work with the City Council to prepare a Request for Proposals/Qualifications for a suitable environmental consultant and conduct a selection process. Once under contract, Mr. Gross will act as the Project Director and manage the environmental assessment and public involvement process.

2. The City of Council Bluffs Community Development Department has managed several federal grants, including approximately \$3 million annually in CDBG, HOME, and ESG program funds. The department has also worked with the Economic Development Administration on various funding programs. The City has the internal fiscal controls in place to ensure the proper management of funds. Our most recent audit dated June 30, 2003 indicates no adverse findings. Additionally, the City is not presently, nor has been subject to comply with special "high risk" terms and conditions associated with agency regulations implementing OMB Circular A-102.
3. Not Applicable.
4. Not Applicable.
5. Not Applicable.

**Exhibit A:**

**City Council Resolution**

RESOLUTION NO. 04-291

A RESOLUTION AUTHORIZING THE MAYOR TO SUBMIT A US EPA BROWNFIELDS ASSESSMENT GRANT APPLICATION FOR THE SOUTH MAIN AREA.

WHEREAS, the City has established a South Main urban Renewal Plan which is generally bounded by 3<sup>rd</sup> Street on the East, 16<sup>th</sup> Avenue on the South, South Expressway on the West and 9<sup>th</sup> Avenue on the North; and

WHEREAS the adoption of this area was intended to cause the redevelopment of this area; and

WHEREAS the City and others have initiated redevelopment activities which has involved the acquisition of property, demolition of structures and public facility improvements; and

WHEREAS these activities have resulted in the discovery of underground soil and groundwater contamination and the amount of level of contamination needs to be determined to effectively proceed with the redevelopment of this area; and

WHEREAS, the US EPA Brownfields Assessment Grant program is a source of funding to identify existing contaminants; and

WHEREAS, an application for said funds is in the best interest of the City; and

NOW, THEREFORE, BE IT RESOLVED  
BY THE CITY COUNCIL  
OF THE  
CITY OF COUNCIL BLUFFS, IOWA:

That the Mayor is hereby authorized and directed to submit a US EPA Brownfields Assessment Grant application for the South Main area.

ADOPTED

AND

APPROVED: November 8, 2004

  
Thomas P. Hanafan Mayor

ATTEST:   
Cheryl Puntene City Clerk

**Exhibit B:**

**Iowa Department of Natural Resources Letter**



THOMAS J. VILSACK, GOVERNOR  
SALLY J. PEDERSON, LT. GOVERNOR

# STATE OF IOWA

DEPARTMENT OF NATURAL RESOURCES  
JEFFREY R. VONK, DIRECTOR

October 28, 2004

Susan Klein  
Regional Brownfields Coordinator  
US EPA Region VII  
901 N 5<sup>th</sup> St  
Kansas City, KS 66101

RE: City of Council Bluffs, Iowa – South Main Brownfields Project Assessment Grant

Dear Susan:

This letter is submitted as a statement of acknowledgement, review and support for the City of Council Bluffs' brownfield assessment grant application, through funding authorized by §104(k) of CERCLA.

The "South Main Brownfields Project" will assist the City with proper environmental decision-making in regard to planned site acquisition and future economic redevelopment opportunities. The project area is current underutilized, containing vacant rail yards and former industrial sites. Residents in the immediate area around the project site, including minorities and low-income citizens, would benefit from brownfield assessment and redevelopment activities in the South Main project area.

The department appreciates the opportunity to have reviewed this project and its goals, and we support these brownfield assessment and redevelopment efforts as presented in this application.

Sincerely,

A handwritten signature in black ink, appearing to read "Mel Pins", written over a horizontal line.

Mel Pins  
Executive officer  
Iowa Brownfield Redevelopment Program  
Geological Survey and Land Quality Bureau

**Exhibit C:**

**South Main Brownfields Project Area Map**

## Potential Environmental Concerns



Project Area



Toxic Release Inventory



Hazardous Waste



## Air Releases

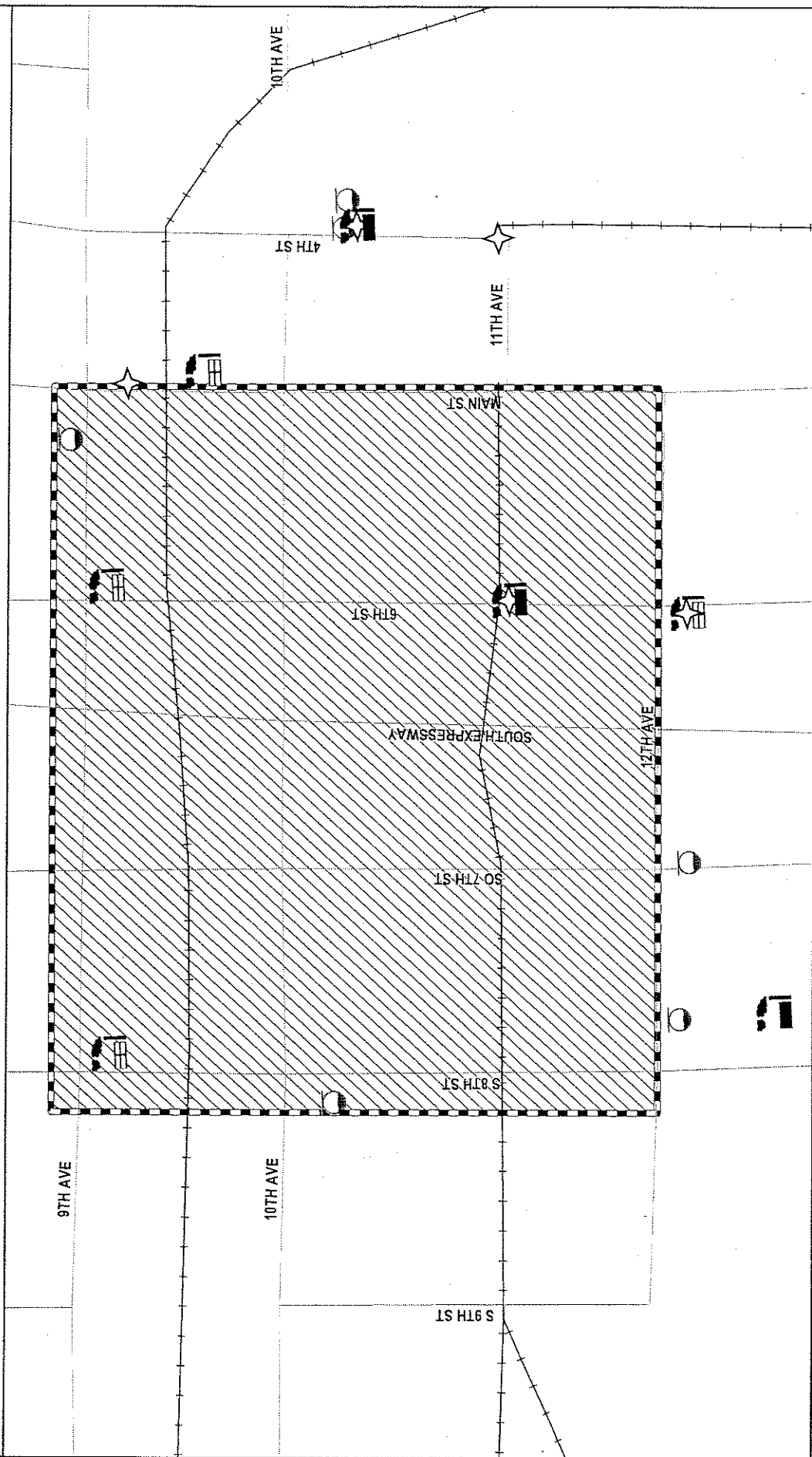


## Leaking Underground Storage Tank Sites



0 125 250

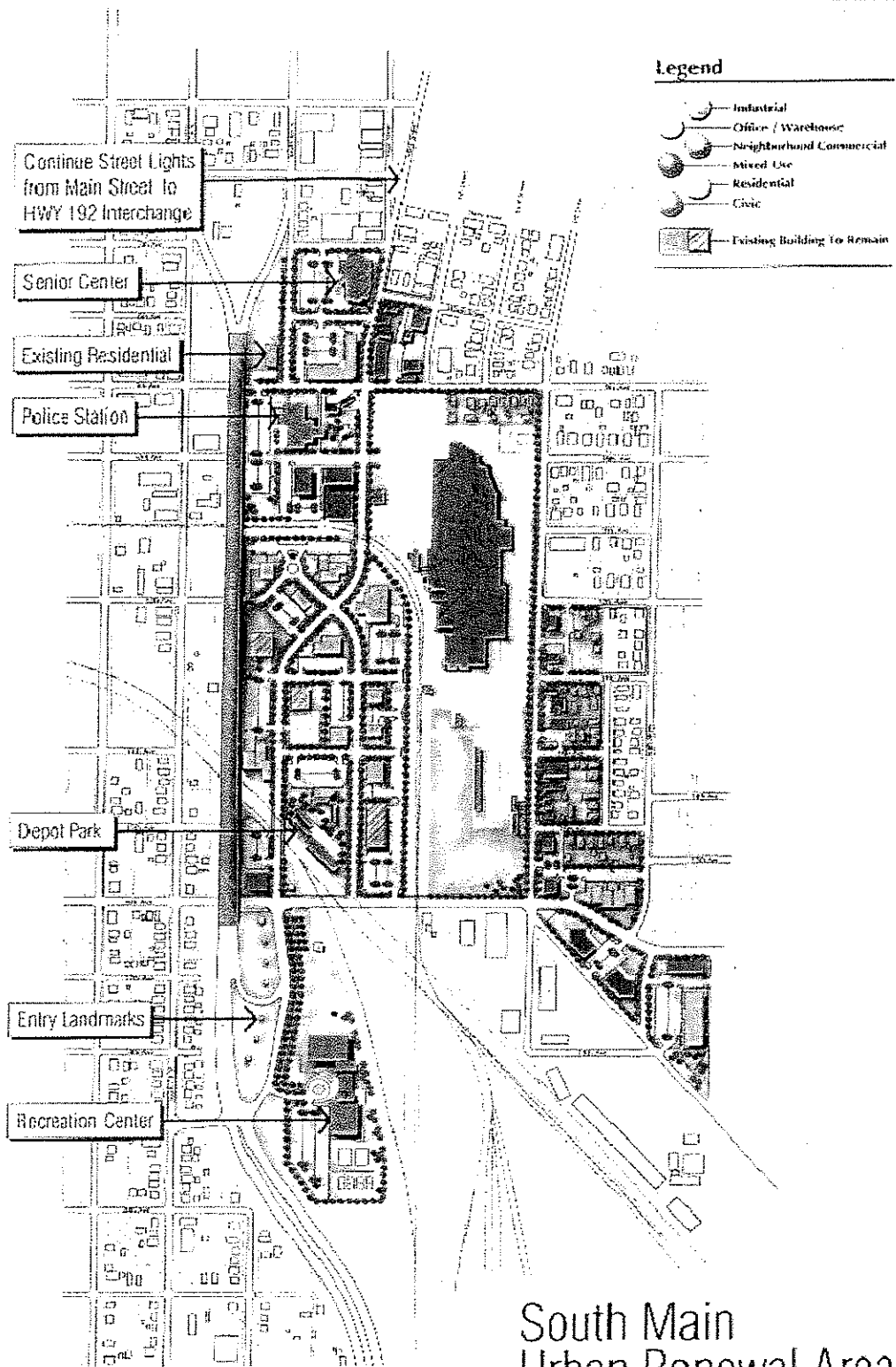
Feet





**Exhibit D:**

**South Main Urban Renewal Area – Conceptual Master Plan**



Conceptual Master Plan

South Main  
Urban Renewal Area  
Council Bluffs, IA

**CITY OF COUNCIL BLUFFS**  
BROWNFIELDS GRANT INITIAL PROPOSAL

**SOUTH MAIN URBAN RENEWAL AREA  
CONCEPTUAL MASTER PLAN**

December 12, 2002 3:54:29 p.m.  
Drawing: T:\16169561\00001\2.dwg

DRN. BY: DAC	DATE: 12/11/02	PROJECT NO.	FIG. NO.
CHK'D. BY:	DATE:	16169561	4

**U.S. EPA Brownfield Assessment Grant Proposal  
Petroleum Materials**



**The City of Council Bluffs, Iowa  
South Main Brownfields Project**

**Prepared By:**

**The City of Council Bluffs, Iowa  
Department of Community Development**



**November 2004**

A. Project Title	City of Council Bluffs, Iowa – South Main Brownfields Project
B. Grant Type	Brownfield Assessment Grant
C. Total Dollar Amount Requested	\$200,000 for Petroleum Material Assessments (area wide)
D. Name of Applicant	City of Council Bluffs, Iowa
E. Project Contact	Mr. Donald Gross Director Department of Community Development City of Council Bluffs 209 Pearl Street Council Bluffs, Iowa 51503 Phone: (712) 328-4629 FAX: (712) 328-4915 E-Mail: <a href="mailto:dgross@councilbluffs-ia.gov">dgross@councilbluffs-ia.gov</a>
F. Chief Executive	Mayor Thomas P. Hanafan City of Council Bluffs 209 Pearl Street Council Bluffs, Iowa 51503 Phone: (712) 328-4601
G. Location	County of Pottawattamie, Council Bluffs, Iowa
H. Population	58,268 (2000 Census)
I. Other	<p>According to the 2000 U.S. Census:</p> <ul style="list-style-type: none"> <li>▪ The City of Council Bluffs population is well below 100,000.</li> <li>▪ The population of the target area<sup>1</sup> has a per capita income as low as \$16,700 which is approximately 18% less than the statewide average and 9% less than the citywide average.</li> <li>▪ Additionally, as much as 11% of families residing within the target area are living below the poverty line.</li> <li>▪ Up to 7% of the residents in the target area receive supplemental security income from the federal government. This is more than double the Iowa rate of 3% and nearly double the city average of 4%.</li> <li>▪ Up to 5% of the residents in the target area receive some form of public assistance income. This exceeds the statewide and citywide percentages of 3% and 4% respectively.</li> </ul> <p>Additionally, the target area and site is located within a designated Urban Renewal Area based on the presence of slum and blighting conditions and is part of a state designated Iowa Enterprise Zone.</p>

<sup>1</sup> The target area is defined as Census Tracts 308 and 310.

### Threshold Criteria

#### A. Applicant Eligibility

The City of Council Bluffs, Iowa is a municipal corporation as defined by the Code of Iowa, Chapter 362. The City was incorporated on April 13, 1853.

#### B. Community Notification

The City of Council Bluffs has initiated several efforts to inform the citizens, affected property owners and other interested parties about the scope of this brownfields redevelopment initiative. These public involvement efforts have also attempted to engage citizens and other stakeholders in the preparation of this funding proposal. Applying several community notification and involvement measures allowed various stakeholders to participate in grant development efforts based on their individual schedules and level of interest.

The community notification approaches used to prepare this funding proposal included:

- *Posting draft documents at public venues:* A copy of the draft Assessment Grant was provided at the City Clerk's office and public library. Also included was a copy of the EPA Proposal Guidelines for Brownfields Assessment Grants. This would enable the reviewer to consider and offer comments on responses to questions consistent with the EPA Grant Guidelines.
- *Posting draft documents on the City Internet Website:* Similar to posting the information at public venues, the City also posted draft documents on the City's website soliciting comments and suggestions.
- *Publishing notices for public comment through local media outlets:* The City issued press releases to area newspapers, television and radio stations asking citizens to participate in the grant development process. The message also included information about where and how they could be involved in the project.
- *Engage specific interest groups:* Copies of the draft grant and associated proposal guidelines were mailed to affected residents, property owners, the Department of Public Works, the Department of Public Health, Community Housing Investment Corporation, Pottawattamie County Development Corporation, Council Bluffs Chamber of Commerce, and non-profit organizations.
- *Hosted a public meeting:* The City publicized a public meeting held in the Community Hall at 205 South Main Street, Council Bluffs, Iowa on October 28, 2004. The public meeting included a presentation summarizing the scope of the project and draft responses to various questions raised by the EPA. The presentation also included hand out materials and contact information for participants to follow up if they had information to offer at a later date.
- *Adoption of a City Council Resolution:* The Council Bluffs City Council adopted a resolution of support and endorsed the submission of the grant proposal. This meeting and Council action was subject to a published public notice and also included time for public comment prior to taking action on the resolution. Exhibit A is a copy of the adopted resolution.

C. Letter from State Environmental Authority

Exhibit B is a letter from Mr. Mel Pins, representing the Iowa Department of Natural Resources, acknowledging the City's intent to file the Brownfields Assessment Grant with the U.S. EPA.

D. Site Eligibility and Property Ownership Eligibility

Council Bluffs is submitting a *Community Wide* application. As such, Section D is not relevant to this proposal.

**Ranking Criteria**

A. Assessment Grant Proposal Budget

**Assessment Grant Proposal Budget – Petroleum Substances Sites:** The budget summarized below reflects how funds would be committed to implement the EPA Brownfields Assessment Grant for those sites believed to be adversely impacted by petroleum substances.

Budget Categories (programmatic costs only)	Project Tasks					
	Task 1	Task 2	Task 3	Task 4	Task 5	Task 6
Personnel	\$0	\$0	\$0	\$0	\$0	\$0
Travel	\$5,000	\$0	\$0	\$0	\$0	\$0
Equipment	\$0	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$0	\$0	\$0
Contractual	\$5,000	\$20,000	\$40,000	\$110,000	\$10,000	\$10,000
Other	\$0	\$0	\$0	\$0	\$0	\$0
<b>Total</b>	<b>\$10,000</b>	<b>\$20,000</b>	<b>\$40,000</b>	<b>\$110,000</b>	<b>\$10,000</b>	<b>\$10,000</b>

*Budget Key:*

- Task 1: Program Implementation – Expenses incurred for activities integral to achieving the purpose of the grant including reports, meetings, conferences, and coordination. Programmatic activities associated with implementing this grant (e.g., meeting reporting requirements, community involvement, etc.) that are assumed by City staff will be provided on an in-kind basis. Further, these City staff driven efforts will be offset through the City's general fund budget.
- Task 2: Community Outreach – Research, technical assistance and training necessary to inform the residents of the target area of the progress of the investigation and its impact on redevelopment planning and implementation. This task also envisions conducting a health study of target area residents and workers, plus integrating the results of Phase I & II ESA data. The City also plans on using a dedicated Internet website to provide updates on the project, post reports, etc.
- Task 3: Phase I Assessments – Conduct preliminary investigations on targeted properties including obtaining site access agreements and report submittal.

- Task 4: Phase II Assessments – Conduct detailed investigations on targeted properties including obtaining site access agreements, collecting soil and groundwater samples, laboratory analyses, and report submittal.
- Task 5: Work Plans – Development and approval of program quality assurance documents to include Quality Assurance Project Plans, Site Specific Sampling Plans, Phase I Site Priority Work Plans and related documents.
- Task 6: Cleanup Planning - Evaluate alternatives for proceeding with further characterization and potential remediation at each Phase II property. The alternatives will be developed in light of regulatory considerations. In addition to methods for proceeding with further action (including potential enrollment in Iowa's Land Recycling Program or Underground Storage Tank Program), preliminary cost estimates will be developed for the various further action alternatives. A brief further action alternative evaluation report will be prepared for each property. Coordinate ESA progress and results with EPA Region VII staff via an "activity brief" to gain concurrence on activity conducted and pending future activity. Additionally, future alternative plans for proceeding through the brownfields redevelopment process will be presented to EPA Region VII staff.

**B. Community Need**

1. The South Main Brownfields Project Area is among the oldest and most deteriorated industrial districts in Council Bluffs. Several properties have been left vacant and very little new investment has occurred in the area. Residents in adjacent neighborhoods represent low income and economically disadvantaged areas that bear a disproportionate share of living in an area stigmatized by depressed property values, heavy truck and railroad traffic, urban noise and odors associated with manufacturing processes. The table below further illustrates the environmental injustices plaguing this area.

Factor/Area	Target Area "A" <sup>2</sup>	Target Area "B" <sup>3</sup>	City of Council Bluffs	Pottawattamie County	State of Iowa
Total Population	3,155	2,426	58,249	87,704	2,926,324
Poverty Rate <sup>4</sup>	7%	11%	10%	8%	9%
% of Children under 5 years living in poverty	10%	3%	12%	12%	10%
Unemployment Rate	N/A	N/A	6.8%	5.9%	4.5%
Per Capita Income	\$16,700	\$19,527	18,143	\$19,275	\$19,674
% Minority Population	8%	4%	4%	3%	5%

<sup>2</sup> Census Tract 308

<sup>3</sup> Census Tract 310

<sup>4</sup> Defined as the percentage of citizens living below the poverty line.

Factor/Area	Target Area "A" <sup>5</sup>	Target Area "B" <sup>6</sup>	City of Council Bluffs	Pottawattamie County	State of Iowa
% Households receiving SSI	7%	5%	4%	2%	3%
% Households receiving Public Assistance	3%	5%	4%	5%	3%

*Sources: Information associated with total population, poverty rate, per capita income, percent minority population, percent households receiving SSI and Public Assistance were obtained from the 2000 U.S. Census. Unemployment Rate information reflects August 2004 statistics issued by Iowa Workforce Development.*

In addition to this information, the University of Iowa published a study entitled, *2004 Cancer in Iowa Report* that cited Pottawattamie County as one of the top ten counties in Iowa for projected cases of cancer and estimated numbers of deaths attributed to cancer. Moreover, as a percentage of new cancers and cancer deaths between 1973 and 2001, Pottawattamie County had the highest death rate in Iowa.

In nearly every measurement attributed to characterizing disadvantaged neighborhoods, residents in the proposed brownfields target area bear a comparatively high burden of living in an economically disadvantaged area. Moreover, exposure to carcinogens in the greater Council Bluffs area is clearly higher than other communities and counties in Iowa. Consequently, the City's plan to use these Brownfields Assessment funds to complete environmental site assessments on priority sites, determine if there is a significant environmental concern and if one or more exist, apply appropriate institutional or engineered controls to address identified concerns. And, if appropriate, implement cleanup standards that help facilitate renewed interest in improving the economic vitality in the area for both residents and businesses, plus remove the potential adverse environmental concerns.

2. Ultimately the presence of underutilized, vacant and abandoned commercial and industrial buildings raises questions of environmental contamination, which depresses area property values and exacerbates the economic isolation of the affected residents. Coupled with other community resources and a commitment to revitalize the area, the Brownfields Assessment Grant will enable the City to conduct Environmental Site Assessments (ESAs) on priority sites and determine what if any environmental impairments exist. This will also enable the City and its partner the Pottawattamie County Development Corporation (PCDC), to assess the level of risk in acquiring targeted sites and "banking" them for future redevelopment projects. Land banking programs are strengthened by determining how environmental contaminants could impact land value and assist in defining the conditions of a land acquisition agreement. Additionally, this information will help determine appropriate reuses for the affected properties and how they can be assimilated into the

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<sup>5</sup> Census Tract 308

<sup>6</sup> Census Tract 310



target area in a manner that adds stability to the adjoining neighborhood and affected residents. Moreover, these efforts will help leverage funds from other sources and provide solid justification for investing public funds based on identified needs.

Plans to use a portion of the Assessment Grant to investigate the health affects of residents and workers within the target area and develop appropriate responses that mitigate associated health risks will also benefit the targeted community.

3. Since its incorporation in 1853, Council Bluffs has been known as an industrial community with significant links to the agricultural, food product, and heavy machinery manufacturing businesses. While contributing to the economic strength of the community, some of these businesses have also had or pose an adverse environmental impact on the community. For example, Council Bluffs has a total of 228 EPA Regulated Facilities, 128 Resource Conservation and Recovery Act (RCRA) Hazardous Waste Generators, 68 Regulated Air Emissions sites, 6 Toxic Release Inventory sites, 21 Comprehensive Environmental Response and Compensation Liability Act (CERCLA) sites, and 11 sites with EPA violations. In addition, the Iowa Department of Natural Resources (IDNR) database has identified 34 National Response Center (NRC) Spill sites, 1 IDNR Hazardous Waste Site, 2 IDNR Landfill sites, and 119 IDNR Leaking Underground Storage Tank (LUST) sites. Several of these potential brownfields sites are within the South Main Brownfields Project Area referenced in Exhibit C.

In several instances the presence or perceived presence of environmental impairments have been complicated by the declining use and closure of many traditional manufacturing operations such as rail yards, lumberyards, foundries, general manufacturers, food processing plants and related supporting businesses in the South Main Brownfields Project Area. These factors have contributed to reduced property values of vacant and abandoned industrial buildings as well as the value of homes in adjacent residential neighborhoods. Additionally, potential health concerns stemming from the likely presence of hazardous materials and petroleum-based contaminants, and the presence of attractive nuisances that contributes to children being attracted to unsecured areas, clearly has a deleterious effect on the economic, health and environmental impacts of the area.

### C. Site Selection Process

1. The City recognizes the real adverse impacts resulting from brownfields sites and the ripple effect that occurs in adjacent areas. Based on these effects, the City and various stakeholders created several criteria to determine the appropriateness of potential brownfields sites and then prioritize them. These criteria include:
  - Listing on EPA or Iowa DNR databases
  - No federal or state intervention/cleanup efforts are underway or being contemplated
  - Proximity to municipal or private well
  - Unsecured property
  - Potential for contamination
  - Proximity to residential areas
  - Proximity to schools

- Potential for environmental justice issues to surrounding residents
- Potential reuse of the site for economic development
- Potential reuse of the site for open/green space
- Access to utilities
- Ability to secure access to the site
- Status of property tax and/or municipal fee delinquencies

Based on these criteria, the historic uses in the area and the current existence of underdeveloped sites, the City has prioritized several classes of properties for Phase I Environmental Site Assessments (ESAs) and Phase II ESAs if warranted. These types of sites include:

- Former coal gas manufacturing facilities.
- Former heavy manufacturing operations, including manufacture of agricultural equipment.
- Railroad alignment and associated storage areas.
- Unregulated dumping sites.
- Above Ground Storage Tanks.

The City will also consider targeting additional properties for Phase I ESAs based on the prospective site's ability to meet the selection criteria and the availability of Assessment Grant funding.

2. Previous efforts to inventory and prioritize potential brownfields sites occurred as part of a community planning effort that resulted in the creation of the South Main Urban Renewal Area Plan and Tax Increment Financing District. The City's Community Development Department involved affected property owners, area residents, the City Planning and Zoning Commission, City Health Department, building and zoning officials, the fire marshal, economic development representatives, real estate developers, members of the financial community and the City Council to assess the existing conditions of the area and develop a comprehensive plan to overcome the adverse conditions presently stigmatizing the area. This application for Brownfields Assessment funding is in direct response to the City's identified need to assess the environmental condition of properties that are having a negative impact on the area and develop strategies to remove the environmental stigma from the area. Consequently, the proposed Assessment grant will be used to assess environmental risk and associated liabilities and use this information to acquire, cleanup and return targeted sites to productive reuse.
3. This project anticipates conducting environmental site assessments on privately owned properties. As such, the City will secure voluntary permission from targeted property owners through an Access Agreement. This Agreement outlines provisions that authorize the City and/or its contractors to gain access to the site for the purpose of conducting environmental site assessments. Although the City wishes to secure access through amicable means, it will also pursue more involuntary efforts (e.g., condemn for a temporary easement) to secure access in situations where the public interest to protect public health and safety is necessary.

D. Sustainable Reuse of Brownfields

The South Main Brownfields Project is consistent with the goals of the EPA's brownfields initiative and provisions within the South Main Urban Renewal Area Plan and other plans adopted by the Council Bluffs City Council. The summary below highlights the relationship between each EPA program goal and the City proposed reuse.

1. The City is working with local and state health and environmental agencies to prevent pollution and reduce resource consumption. For example, the City Health Department and Fire Marshall have cited several recommendations designed to mitigate exposure to known contaminants. Among these recommendations is adopting risk-based corrective actions based on future use, considering the application of institutional controls and insurance, and empowering the public to act with respect to the type of risk communicated. Moreover, the City encourages and incentivizes economic development projects that include green building design, alternative storm water management, environmentally beneficial landscaping and other building and design approaches to sustainable redevelopment.
2. Exhibit D illustrates the proposed redevelopment plan for the South Main Brownfields Project Area. The intent of this plan is to create opportunities for new private sector investment in the area that creates sustainable employment opportunities, enhanced tax base and benefits residents in the adjacent neighborhoods. Recommended uses include a mixed office and warehouse area, with neighborhood scale commercial areas abutting arterial streets and the residential areas, and integrating the use of streetscaping and greenspace to help buffer and mitigate impacts brought on by differing land uses. A clear goal of this plan is to create quality employment opportunities, expand the tax base and enhance the property values in the area. We are confident this plan achieves these goals.
3. The South Main Brownfields Plan integrates mixed uses to create economic opportunity for those seeking employment, while creating commercial retail and housing alternatives that compliment adjacent neighborhoods and contribute to their sustainability. For example, the inclusion of a senior housing development will provide an important anchor project for the south end of the downtown area and provide convenient means of transporting seniors and other citizens via public transit, trail/sidewalk systems, private vehicle, etc.
4. One of the greatest examples of how this project promotes sustainable reuse is in the commitment to reinvest in the city's urban core. Rather than perpetuating growth at the urban fringe, the City is making a clear commitment to revitalize underdeveloped and environmentally impaired areas that have a wide array of public utility services and resources. In fact, the presence of the Council Bluffs Senior Center provides inter-generational programs for senior citizens and area youth. Additionally, Habitat for Humanity, which operates a facility in the target area, and the Community Housing Investment Corporation target sites in the area for new housing construction for low-income individuals. Lastly, the Council Bluffs Panthers Wrestling Club is conveniently located to disadvantaged youth living in the area and provides youth programming.

5. Redevelopment within this target area will promote the use of several transportation choices. Planned improvements include provisions for trails linking neighborhoods with employment centers, retail districts, schools, and recreational venues such as area parks and regional trail systems. In addition, the target area is served by a regional transit and para-transit system to meet the needs of families with limited transportation options and/or physical disabilities.
6. Through this redevelopment process, the City has adopted several initiatives to prevent the creation of future brownfields sites. For example, the City Council applies financial incentives to encourage new, cleaner industries to develop in areas impacted by abandoned or underdeveloped properties. The City Council has also adopted ordinances, land use restrictions and procedures that prohibit or add regulatory review to land use types that have historically had an adverse impact on the environment. Additionally, the City's zoning ordinance prohibits the construction of private wells and encourages the appropriate abandonment of private wells.

E. Creation and/or Preservation of Greenspace/Open Space or Nonprofit Purpose

The South Main Brownfields Plan creatively uses greenspace and open space areas to buffer residential areas from proposed commercial and office/warehouse districts. This is a constructive means of transitioning different land uses while establishing urban stability in the area. To illustrate, greenspace buffers will serve both to transition land uses while integrating pedestrian facilities to accommodate residents coming and going to work, exercise, or shop. The clear advantage to this approach is that these facilities will be owned and maintained by the City of Council Bluffs. This will ensure long-term management and care for the facilities as well as meet the demands of the community. In addition, the application of policies and using regulatory agencies like the Iowa Department of Natural Resources to apply risk-based corrective actions that are consistent with future uses as well as applying institutional and engineered controls will provide for the long-term management and care of the area.

As referenced in Section D, the Habitat for Humanity facility, Council Bluffs Senior Center, and Council Bluffs Panthers Wrestling Club are representative non-profit organizations within or adjacent to the South Main Brownfields Project Area and provide a wide array of programming for area citizens. Additionally, these organizations also contribute to building neighborhood stability.

It is also important to point out that the proposed reinvestment in the area will preserve the open space and the urban fringe. As part of the City's growth management practices and consistent with the Comprehensive Plan, the City Planning Commission and City Council emphasize the reuse and revitalization of urbanized areas to the extent possible versus encouraging development at the fringe of Council Bluffs. The net result is facilitating higher density development within the city limits, preserving agricultural land and the unique geological formation in the form of the Loess Hills.

F. Community Involvement

1. As indicated in Section B of the Threshold Criteria, Council Bluffs has used several community involvement approaches to identify and engage various stakeholder groups in the preparation of this funding proposal. However even before the preparation of this funding request, the City initiated several other initiatives that brought various segments of the community together to define the redevelopment needs of the South Main Brownfields Project Area and define how these ideas would make Council Bluffs a more vibrant community. For example, the creation of the South Main Urban Renewal Area Plan involved numerous interest groups such as the Chamber of Commerce, Pottawattamie County Development Corporation (PCDC), the Iowa West Foundation, Council Bluffs Senior Center, affected property owners, and residents. This commitment to meaningful community involvement has resulted in a redevelopment plan posed for positive change and has cultivated community support.

To ensure that this project stays at the forefront of community revitalization efforts and is implemented as planned, the South Main Brownfields Project Steering Committee has been assembled. With representation from the groups listed above, the Steering Committee will use this assessment grant to assess environmental risk associated with acquiring targeted sites, make recommendations to the City and PCDC regarding the acquisition, cleanup and redevelopment of these sites and ultimately banking them for future redevelopment. Additionally, the Committee will be integral to leverage the City's efforts to keep the community and area stakeholders informed about the progress of the project and solicit feedback concerning cleanup decisions and reuse planning in the context of what the ESAs uncover. The City will act in a manner consistent with the National Contingency Plan relative to designating a spokesperson to inform the community, preparing an Engineering Evaluation/Cost Analysis (EE/CA), developing and implementing a community relations plan, identifying a repository for related information, publishing appropriate notices, providing adequate review time for relevant documents, and responding to significant concerns.

2. Prior to the submission of this funding proposal, Council Bluffs and some representative owners of potentially environmentally impaired sites have been involved in discussions with the City Public Health Department and Iowa Department of Natural Resources, Iowa Department of Economic Development and Iowa Department of Transportation about the environmental concerns of the targeted area, its implications to human health and future reuse. The City will perpetuate this relationship with these agencies and the U.S. EPA as necessary. To the extent possible the City will likely pursue enrollment in the Iowa Land Recycling Program or equivalent cleanup program; consequently, it is in the City's best interest to engage appropriate regulatory agencies as early as possible and seek their counsel in cleanup and reuse decisions.
3. The City believes that by using a wide array of communication mechanisms, community understanding will increase and more meaningful dialogue will result. Consequently, the City will host frequent open houses to share results from field studies and engage citizens in sharing ideas and opinions concerning cleanup options. The City will also conduct presentations to various interest groups, City Council, and others concerning the progress

of the project. Additionally, information will be shared through the City's Internet Website. Representatives from the South Main Brownfields Steering Committee will also be tasked with the responsibility to share information with their respective groups as a means of cross pollinating stakeholders with information and soliciting feedback that can be shared with the Steering Committee.

According to the 2000 U.S. Census, only a small fraction of the target area residents speak languages other than English as their primary language. In fact, only four percent of the residents in part of the target area speak fluent Spanish, Indo-European, or Asian languages combined. Consequently, in those unique situations where information requires translation, the City will accommodate requests on an as needed basis. The City will also try to accommodate individuals with hearing or visual impairments.

4. The table below highlights the participants involved in this project, their contact information and a summary of their role in the project.

Contact	Phone Number	Agency/Association	Organization's Activities
Bob Mundt, President/CEO	712-325-1000	Council Bluffs Chamber of Commerce	Business retention and attraction
Matt Buchanan	712-325-1000	Pottawattamie County Development Corp.	Conduct land banking and redevelopment activities.
Edward Clement, Environmental Services	816-737-7408	Aquilla, Inc.	Owner of targeted site.
Greg Reeder, City Engineer	712-328-4635	City of Council Bluffs Public Works Department	Plans and implements capital improvements throughout the City.
Doug Drummy, Director	712-328-1008	Council Bluffs Water Works	Plans and implements capital improvements concerning water projects in Council Bluffs.
Donn Dierks, Director	712-328-4666	Council Bluffs Public Health Department	Focuses on improving, protecting and promoting the health, environment and the well-being of residents in Council Bluffs
Ron Hopp, Director	712-328-4650	Council Bluffs Parks, Recreation & Public Property Department	Responsible for the construction, management and maintenance of parks and publicly-owned property in Council Bluffs
Tom Jensen, Executive Director	712-323-5995	Council Bluffs Senior Center Inc.	Operates and directs programming for this non-profit organization located in the target area.

Contact	Phone Number	Agency/Association	Organization's Activities
Ron Pierce, Executive Director	712-328-9476	Habitat for Humanity	Builds housing for low-income residents and has a facility in the target area.
Joe Kueper, Executive Director	712-328-6602	Community Housing Investment Corporation	Builds Infill housing for low and moderate-income residents throughout the city.

G. Reduction of Threats to Human Health and the Environment

1. The types of properties being targeted for Environmental Site Assessments (ESAs) are commonly associated with the release of heavy metals, volatile and semi-volatile organic compounds, PCBs, Coal Tar, and PAHs. These contaminants are also known carcinogens. To establish a bench mark pertaining to the health conditions of persons living and working within the target area, the City will commit up to 10 percent of the grant award to identify threats to human health and the overall environment of the target area. This health assessment, coupled with the environmental site assessment efforts will help create broad and site specific recommendations that effectively reduce exposure to elements in the environment that compromise a healthy living and working environment. Additionally, the continued involvement of the City's Public Health Department is key to the successful implementation of the South Main Brownfields Project. Specifically, the City will follow the approach summarized below to identify threats:
  - The City will use property tax records to assemble a distribution list of residents and businesses within and adjacent to the target area. Both residents and business owners will receive a letter and survey outlining the purpose of the questionnaire and how the information will be used. Alternatively, the cover letter will also direct the resident/worker to an Internet website where the person could complete the survey. The City will develop a questionnaire with the assistance of qualified public health officials. Moreover, the cover letter will highlight how the survey results will be used and assure respondents that the results will remain confidential.
  - Phase I Environmental Site Assessments will be conducted on targeted sites, and if appropriate, Phase II ESAs will be performed. Reported findings will identify and discuss recognized environment concerns that pose a real health threat to humans and/or the environment.
  - All non-client specific data will be shared with the Public Health Department and the Environmental Consultant for the purpose of analysis and to develop recommendations of how the area could be redeveloped to eliminate or substantially reduce adverse impacts.
  - The City will also re-survey the affected area every five years to monitor changes in health and environmental conditions and assess the effectiveness of implementing associated recommendations.
2. The City has participated in meetings with the Iowa Department of Natural Resources and property owners from the target area to define a responsible approach to assess,

characterize and plan for the cleanup and redevelopment of the South Main Brownfields Project Area. Through the use of this grant, the City anticipates having more substantive discussions with IDNR and affected property owners to identify and apply a risk-based plan to remove and/or manage any adverse environmental conditions found through the environmental site assessment process.

#### H. Leveraging of Additional Resources

1. This project is at an early stage of development; consequently, it is difficult to fully define the anticipated financial needs of the project. However, despite this situation the City has established several funding need parameters and identified funding sources to address these concerns. As this project is implemented, the City proposes to expand current relationships with EPA staff, and representatives from appropriate state agencies (e.g., Iowa Department of Natural Resources, Iowa Department of Economic Development and Iowa Department of Transportation) to examine the appropriate fit of the proposed project and eligibility considerations of various programs summarized below.

- *Strategically use EPA Brownfields Grants to assess risk prior to purchase.* At this stage of the project, this request for Assessment Grant assistance is Council Bluffs' top priority. In fact, using these funds to identify environmental contaminants, assess risk and liability and consider possible cleanup strategies is the cornerstone of the City's ability to acquire these sites responsibly and begin the redevelopment process. Section C references several types of properties that are candidates for Phase I ESA's the City is also home to 228 EPA Regulated Facilities, 128 RCRA Hazardous Waste Generators, 68 Regulated Air Emissions sites, 6 Toxic Release Inventory sites, 21 CERCLA sites, and 11 sites with EPA violations. In addition, the IDNR database has identified 34 NRC Spill sites, 1 IDNR Hazardous Waste Site, 2 IDNR Landfill sites, and 119 IDNR LUST sites. Based on this extensive inventory of potential candidate brownfields properties, Council Bluffs clearly has several other sites that are excellent candidates for environmental site assessments.

In addition to the Assessment Grant, the City will explore the applicability of EPA Revolving Loan Fund and/or Cleanup Grant programs to address clearly defined environmental concerns.

- *Leverage local resources to position the South Main Brownfields Project for renewed investment.* The Pottawattamie County Development Corporation has played an effective role in acquiring properties for the purpose of facilitating redevelopment in the Council Bluffs area. We see their involvement in this project as critical to its success because they focus exclusively on removing the barriers to sell and redevelop the properties, thus creating new job opportunities and diversifying the local tax base. A clear advantage in this situation is that the Pottawattamie County Development Corporation and the City are partnering to convert these environmentally impaired properties into a sustainable reuse. To fully satisfy its role, however, the Assessment grant will help evaluate the environmental risk and help determine fair market value of the properties prior to purchase.



- *Use local funding mechanisms to facilitate redevelopment efforts.* The South Main Brownfields Project area is within the South Main Urban Renewal Plan Area. As such this district has the ability to create tax increment revenue to reinvest in public improvements, site redevelopment and other eligible expenses that remove the existing slum and blighting conditions in the area. In addition, Council Bluffs is a federal entitlement city and receives \$1.3 million through the U.S. Department of Housing and Urban Development's Community Development Block Grant (CDBG) Program. These funds have been used successfully to reinvest in housing stock, utilities, roads, etc., in low-to-moderate income neighborhoods. This target area is an excellent candidate for the use of these funds as a means of removing blighting conditions and encouraging private sector investment.
  - *The South Main Brownfields Project Area is designated as an Iowa Enterprise Zone.* This designation will provide the added incentive of providing investment tax credits to private sector investments in the area. It is also significant to note that Enterprise Zones can only be established in areas that meet two or more of the following criteria: comparatively low per capita income, housing vacancies at 10 percent or above, property valuations that are 75 percent or less of the countywide average, and show signs of blight.
  - *Commercial activities in the area will be eligible for the New Market Tax Credits.*
  - *Have invested approximately \$5 million in capital improvement projects to upgrade public facilities and make the area more conducive to attract private sector investment.*
  - *Diligently research and pursue additional relationships and funding opportunities that removes the environmental stigma of the area and facilitates redevelopment.* The City and its partners are committed to obligate the resources necessary to establish new and expanded relationships with potential funding sources as well as private sector entities that can expedite the implementation of the South Main Brownfields Project.
2. The City, PCDC and other local organizations have invested approximately \$3 million to begin the process of overcoming the blighting conditions pervasive in the Mid-City district; plus countless in-kind hours spent to leverage these funds, meet with affected property owners and residents, and work with area and state agencies. Additionally, the City has obligated general fund monies through Capital Improvement Project budgets to reinvest in infrastructure and make the area more conducive to private investment. Despite this commitment of time and investments, the South Main Brownfields Project Area requires the assessment funds to define the magnitude of the environmental concerns and develop a strategy to address these concerns. Consequently, this grant is key to the success of this initiative.
3. Beyond the funding commitments described in subsections 1. and 2. of this section, the City has experience and success securing additional funds and investment incentives through federal and state government as well as local foundations that will direct capital and private investment in specific ways. For example,
- *Federal Economic Development Administration Funding for public works and brownfields projects.*

- Federal Brownfields Economic Development Initiative Funding (BEDI) to invest in the redevelopment of brownfields properties and benefit low income areas.
- Iowa Department of Transportation Revitalizing Iowa's Sound Economy funding to invest in transportation infrastructure, including railroad lines, that leads to new job creation. Additionally, the IDOT also provides additional points for projects involving brownfields sites.
- Federal and state housing assistance programs, such as the Senior and Local Housing Assistance program, Low-Income Housing Tax Credits, New Market Tax Credits, Historic Tax Credits, HOME funds to create or improve affordable housing options, Farmers Home Administration Insured Mortgages, and continued support from the Iowa West Foundation.

I. Ability to Manage Grants

1. The City of Council Bluffs has a wealth of experience in managing federal contracts and is confident that these experiences will enable the City to manage and oversee all phases of work under this grant. Mr. Donald Gross, Director of Community Development will be assigned grant management responsibilities. Additionally, Mr. Scott Sanders, Finance Director will provide assistance as needed by Mr. Gross. Both Mr. Gross and Mr. Sanders have the requisite experience to meet the financial management needs of this project. Several federal and state grants currently being administered by the City of Council Bluffs include several federal and state funds including Economic Development Initiative, Economic Development Administration, public safety grant (COPS), Community Development Block Grant (CDBG), Home Investment Partnership (HOME) Program, Emergency Shelter Grant (ESG) Program, Federal Emergency Management Agency (FEMA) Project Impact Grant, and an Iowa Department of Transportation Revitalizing Iowa's Sound Economy (RISE) roadway improvement grant.

Additionally, Mr. Gross will work with the City Council to prepare a Request for Proposals/Qualifications for a suitable environmental consultant and conduct a selection process. Once under contract, Mr. Gross will act as the Project Director and manage the environmental assessment and public involvement process.

2. The City of Council Bluffs Community Development Department has managed several federal grants, including approximately \$3 million annually in CDBG, HOME, and ESG program funds. The department has also worked with the Economic Development Administration on various funding programs. The City has the internal fiscal controls in place to ensure the proper management of funds. Our most recent audit dated June 30, 2003 indicates no adverse findings. Additionally, the City is not presently, nor has been subject to comply with special "high risk" terms and conditions associated with agency regulations implementing OMB Circular A-102.
3. Not Applicable.
4. Not Applicable.
5. Not Applicable.

**Exhibit A:**

**City Council Resolution**

RESOLUTION NO. 04-291

A RESOLUTION AUTHORIZING THE MAYOR TO SUBMIT A US EPA BROWNFIELDS ASSESSMENT GRANT APPLICATION FOR THE SOUTH MAIN AREA.

WHEREAS, the City has established a South Main urban Renewal Plan which is generally bounded by 3<sup>rd</sup> Street on the East, 16<sup>th</sup> Avenue on the South, South Expressway on the West and 9<sup>th</sup> Avenue on the North; and

WHEREAS the adoption of this area was intended to cause the redevelopment of this area; and

WHEREAS the City and others have initiated redevelopment activities which has involved the acquisition of property, demolition of structures and public facility improvements; and

WHEREAS these activities have resulted in the discovery of underground soil and groundwater contamination and the amount of level of contamination needs to be determined to effectively proceed with the redevelopment of this area; and

WHEREAS, the US EPA Brownfields Assessment Grant program is a source of funding to identify existing contaminates; and

WHEREAS, an application for said funds is in the best interest of the City; and

NOW, THEREFORE, BE IT RESOLVED  
BY THE CITY COUNCIL  
OF THE  
CITY OF COUNCIL BLUFFS, IOWA:

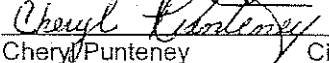
That the Mayor is hereby authorized and directed to submit a US EPA Brownfields Assessment Grant application for the South Main area.

ADOPTED

AND

APPROVED: November 8, 2004

  
Thomas P. Hanafan Mayor

ATTEST:   
Cheryl Puntene City Clerk

**Exhibit B:**

**Iowa Department of Natural Resources Letter**



# STATE OF IOWA

THOMAS J. VILSACK, GOVERNOR  
SALLY J. PEDERSON, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES  
JEFFREY R. VONK, DIRECTOR

October 28, 2004

Susan Klein  
Regional Brownfields Coordinator  
US EPA Region VII  
901 N 5<sup>th</sup> St  
Kansas City, KS 66101

RE: City of Council Bluffs, Iowa – South Main Brownfields Project Assessment Grant

Dear Susan:

This letter is submitted as a statement of acknowledgement, review and support for the City of Council Bluffs' brownfield assessment grant application, through funding authorized by §104(k) of CERCLA.

The "South Main Brownfields Project" will assist the City with proper environmental decision-making in regard to planned site acquisition and future economic redevelopment opportunities. The project area is current underutilized, containing vacant rail yards and former industrial sites. Residents in the immediate area around the project site, including minorities and low-income citizens, would benefit from brownfield assessment and redevelopment activities in the South Main project area.

The department appreciates the opportunity to have reviewed this project and its goals, and we support these brownfield assessment and redevelopment efforts as presented in this application.

Sincerely,

A handwritten signature in black ink, appearing to read "Mel Pins", written over a horizontal line.

Mel Pins  
Executive officer  
Iowa Brownfield Redevelopment Program  
Geological Survey and Land Quality Bureau

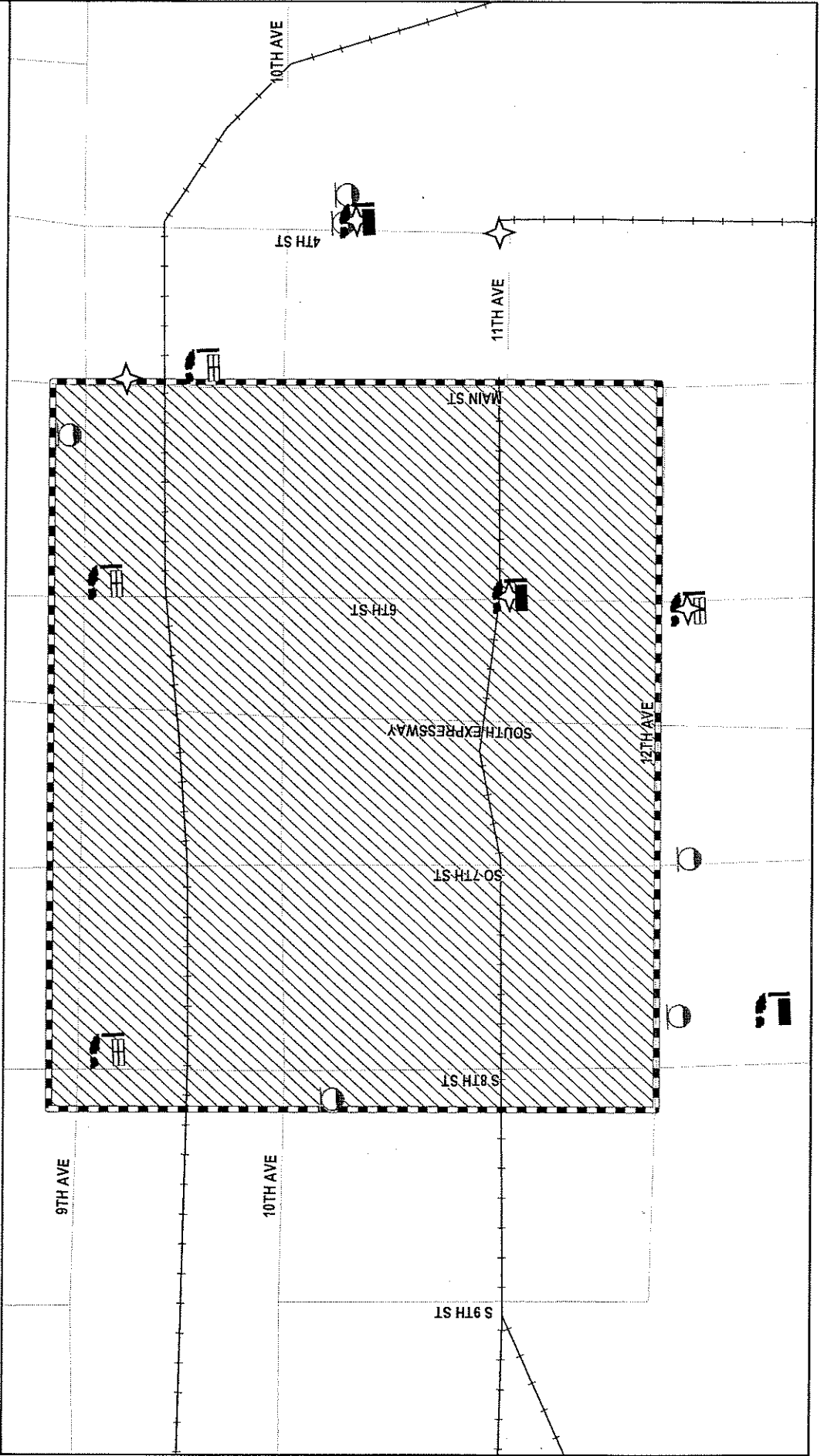
**Exhibit C:**

**South Main Brownfields Project Area Map**

## Potential Environmental Concerns



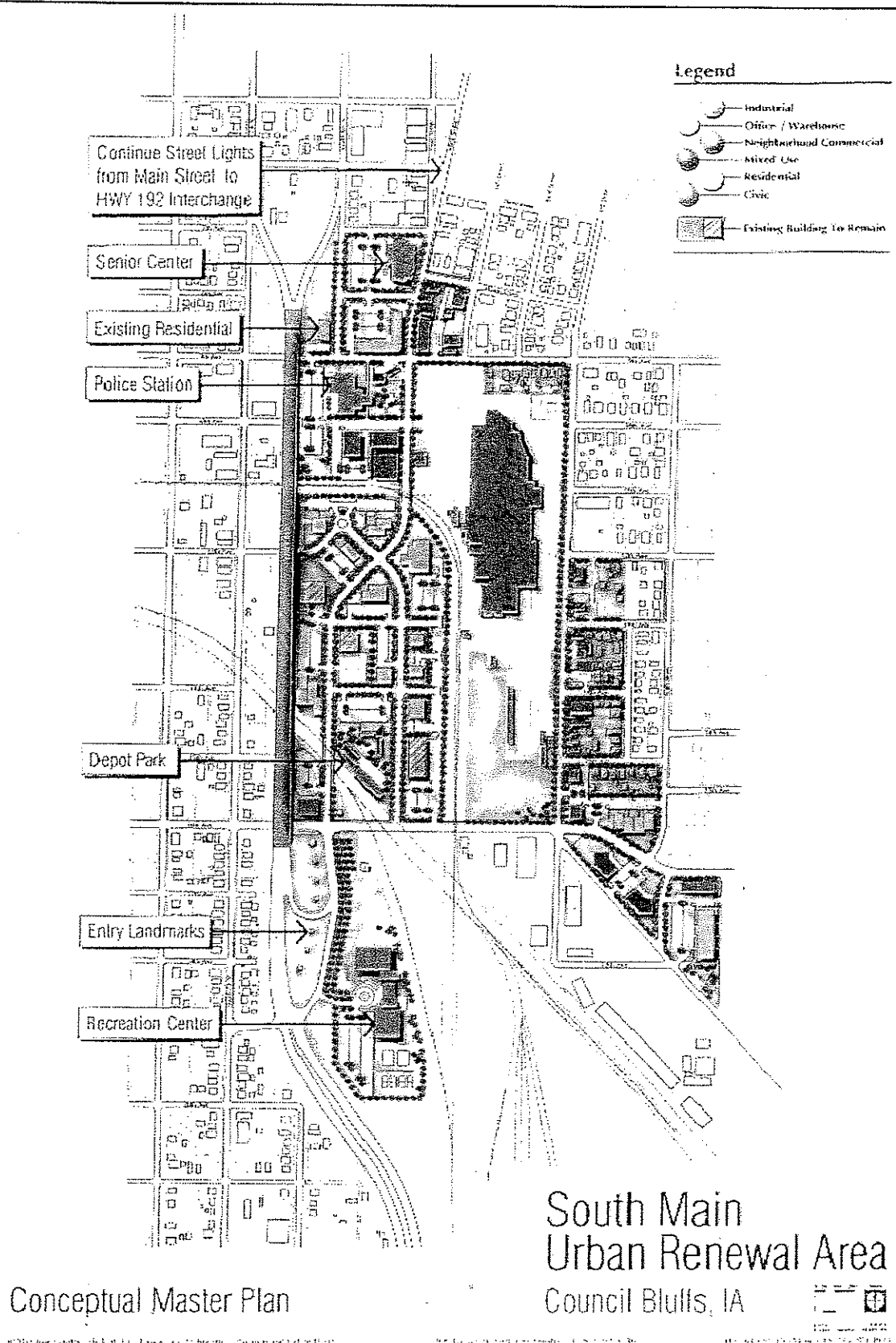
## Leaking Underground Storage Tank Sites





**Exhibit D:**

**South Main Urban Renewal Area – Conceptual Master Plan**



South Main  
Urban Renewal Area  
Council Bluffs, IA

Conceptual Master Plan

**CITY OF COUNCIL BLUFFS**  
BROWNFIELDS GRANT INITIAL PROPOSAL

**SOUTH MAIN URBAN RENEWAL AREA  
CONCEPTUAL MASTER PLAN**

DRN. BY: DAC	DATE: 12/11/02	PROJECT NO. 16169561	FIG. NO. 4
CHK'D. BY:	DATE:		